

### **REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-20 in the Application. In previous responses, the Applicants amended Claims 1 and 11, added Claims 21 and 22, and substantially incorporated Claims 6 and 16 into Claims 1 and 11, respectively, canceling Claims 6 and 16 without prejudice or disclaimer, as a result. In the present response, the Applicants have not amended, canceled, or added any claims. Accordingly, Claims 1-5, 7-15 and 17-22 are currently pending in the Application.

#### **I. Rejection of Claims 1, 11, and 22 under 35 U.S.C. §102**

The Examiner has rejected Claims 1, 11, and 22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0014460 by Moroo, *et al.* ("Moroo"). The Applicants respectfully disagree since Moroo does not teach or suggest arranging data according to a database format and sending the data in the database format from a processing server to a mobile telephone as presently recited in independent Claims 1 and 11.

The Examiner cites steps S102-103 in Figure 6 of Moroo to teach arranging data according to a database format and step S3 to teach a mobile telephone receiving the data in a database format from a processing server. The Examiner appears to equate the URL described in Moroo with the claimed database format. (*See* Examiner's Action of December 17, 2007, pages 2-3.) Moroo teaches at step S102, a server 12 reads image data out of an image data holding unit 28 and an image data processing unit 30 executes a stegano data acquisition processing. The stegano data acquired by the image processing unit 30 is given to a data conversion unit 46 at step S103 for converting into a URL using a conversion table, where the acquired stegano is registered beforehand. The URL

converted by the data conversion unit 46 is sent to the mobile telephone 10 through communication path 42-2. At step S3, the mobile telephone 10 allows a result data receiving unit 20 to receive the URL converted from the stegano data as the result data from the server 12. The URL is used to display the page specified by the URL from a third apparatus, WWW server 44, on the screen of the mobile telephone 10 such that the user can read it. (*See*, for example, paragraph 34 and Figures 4-6.)

Thus, Moroo teaches a server reads image data and an image processing unit acquires data that is then converted into an URL. The URL is then sent to a mobile telephone which then accesses a third apparatus which returns an image representing the acquired data to the mobile telephone where the user can read it on the screen of the mobile telephone. The Applicants fail to find where a URL is a database format as recited in independent Claims 1 and 11. Even assuming *arguendo* a URL is a database format, the Applicants fail to find where the URL sent is the data acquired by the image processing unit. On the contrary, the URL merely represents the data acquired by the image processing unit. For at least these reasons, Moroo does not teach or suggest arranging data according to a database format and sending the data in the database format from a processing server to a mobile telephone as presently recited in independent Claims 1 and 11. As such, Moroo does not anticipate independent Claims 1 and 11 and Claims that depend thereon. Accordingly, the Applicants respectfully request the Examiner withdraw the §102(e) rejection of Claims 1, 11, and 22 and allow issuance thereof.

## **II. Rejection of Claims 2-5, 7-10, 12-15, and 17-21 under 35 U.S.C. §103**

The Examiner has rejected Claims 2-5, 7-10, 12-15, and 17-21 under 35 U.S.C. §103(a) as being unpatentable over Moroo for Claim 21 and Moroo in view of: U.S. Patent No. 6,956,833 to

Yukie, *et al.* ("Yukie") for Claims 2, 7, 9, 12, 17 and 19; U.S. Patent Application Publication No. 2003/0211856 by Zilliacus ("Zilliacus") for Claims 3 and 13; U.S. Patent Application Publication No. 2003/0087650 by Aarnio ("Aarnio") for Claims 4-5, 8, 14-15 and 18; and U.S. Patent Application Publication No. 2003/0181200 by Iida ("Iida") for Claims 10 and 20. The Applicants respectfully disagree.

As established above, Moroo does not teach or suggest arranging data according to a database format and sending the data in the database format from a processing server to a mobile telephone as presently recited in independent Claims 1 and 11. Yukie, Zilliacus, Aarnio, or Iida have not been cited to cure the above-noted deficiencies of Moroo but to teach the subject matter of the above-mentioned dependent Claims. (*See* Examiner's Action of December 17, 2007, pages 3-6.) Additionally, the Applicants do not find where Yukie, Zilliacus, Aarnio, or Iida cure the above-noted deficiencies of Moroo. As such, Moroo alone or the cited combination of Moroo with Yukie, Zilliacus, Aarnio, or Iida does not establish a *prima facie* case of obviousness of presently amended independent Claims 1 and 11 and Claims that depend thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claims 2-5, 7-10, 12-15, and 17-21 and allow issuance thereof.

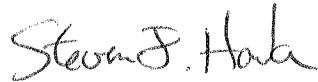
### **III. Conclusion**

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this Application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-5, 7-15 and 17-22.

The Applicants request the Examiner to telephone the undersigned agent of record at (972) 480-8800 if such would further or expedite the prosecution of the present Application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

HITT GAINES, PC

A handwritten signature in black ink that reads "Steven J. Hanke". The signature is written in a cursive, flowing style.

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